## **Section 1. Registration Information**

#### Source Identification

Facility Name: Winslow LPG Terminal

Parent Company #1 Name: NGL Supply Terminal Company LLC

Parent Company #2 Name: NGL Energy Partners LP

## Submission and Acceptance

Submission Type: First-time submission

Subsequent RMP Submission Reason:

Description:

Receipt Date:04-Jun-2010Postmark Date:04-Jun-2010Next Due Date:04-Jun-2015Completeness Check Date:01-Nov-2011

Complete RMP: Yes

De-Registration / Closed Reason:

De-Registration / Closed Reason Other Text:

De-Registered / Closed Date:

De-Registered / Closed Effective Date:

Certification Received: Yes

## **Facility Identification**

EPA Facility Identifier: 1000 0021 0755

Other EPA Systems Facility ID:

## Dun and Bradstreet Numbers (DUNS)

Facility DUNS:

Parent Company #1 DUNS:

Parent Company #2 DUNS: 965465086

## **Facility Location Address**

Street 1: 1294 South Highway 87

 Street 2:
 P. O. Box 427

 City:
 Winslow

 State:
 ARIZONA

 ZIP:
 86047

ZIP4:

County: NAVAJO

### Facility Latitude and Longitude

Latitude (decimal): 35.01217 Longitude (decimal): -110.70156

Lat/Long Method: Interpolation - Satellite
Lat/Long Description: Process Unit Area Centroid

Horizontal Accuracy Measure:

Horizontal Reference Datum Name: North American Datum of 1983

Source Map Scale Number:

Owner or Operator

Operator Name: NGL Supply Terminal Company LLC

Operator Phone: (317) 379-0322

**Mailing Address** 

Operator Street 1: P.O. Box 568

Operator Street 2:

Operator City:LebanonOperator State:INDIANAOperator ZIP:46052

Operator ZIP4:

Operator Foreign State or Province:

Operator Foreign ZIP:
Operator Foreign Country:

Name and title of person or position responsible for Part 68 (RMP) Implementation

RMP Name of Person: John Fansher

RMP Title of Person or Position:

RMP E-mail Address:

Manager of Terminal Operations
john.fansher@nglep.com

**Emergency Contact** 

Emergency Contact Name:

Emergency Contact Title:

Terminal Operator
Emergency Contact Phone:

(928) 289-3374

Emergency Contact 24-Hour Phone:

(928) 289-3374

Emergency Contact Ext. or PIN:

Emergency Contact E-mail Address: john.whitley@nglep.com

Other Points of Contact

Facility or Parent Company E-mail Address:

Facility Public Contact Phone: (928) 289-3374

Facility or Parent Company WWW Homepage

Address:

www.nglenergypartners.com

Local Emergency Planning Committee

LEPC: Navajo County LEPC

Full Time Equivalent Employees

Number of Full Time Employees (FTE) on Site: 2

FTE Claimed as CBI:

Covered By

OSHA PSM: Yes

EPCRA 302 : CAA Title V:

Air Operating Permit ID:

## **OSHA** Ranking

OSHA Star or Merit Ranking:

## Last Safety Inspection

Last Safety Inspection (By an External Agency)

Date:

Last Safety Inspection Performed By an External

Agency:

18-May-2010

Fire Department

## Predictive Filing

Did this RMP involve predictive filing?:

## **Preparer Information**

Preparer Name: Roy Newholm
Preparer Phone: (505) 330-1479
Preparer Street 1: 5120 Mesa del Oso

Preparer Street 2:

Preparer City: Farmington
Preparer State: NEW MEXICO
Preparer ZIP: 87402

Preparer ZIP4:

Preparer Foreign State: Preparer Foreign Country: Preparer Foreign ZIP:

Confidential Business Information (CBI)

CBI Claimed:

Substantiation Provided: Unsanitized RMP Provided:

### Reportable Accidents

Reportable Accidents: See Section 6. Accident History below to determine

if there were any accidents reported for this RMP.

### **Process Chemicals**

Process ID: 1000016812
Description: LPG Terminal
Process Chemical ID: 1000019996

Program Level: Program Level 3 process

Chemical Name: Propane
CAS Number: 74-98-6
Quantity (lbs): 1606500

CBI Claimed:

Flammable/Toxic: Flammable

Process ID: 1000016812

Description: LPG Terminal

Process Chemical ID: 1000019997

Program Level: Program Level 3 process

Chemical Name: Butane
CAS Number: 106-97-8
Quantity (lbs): 735930

CBI Claimed:

Flammable/Toxic: Flammable

## **Process NAICS**

Process ID: 1000016812
Process NAICS ID: 1000017194

Program Level: Program Level 3 process

NAICS Code: 42471

NAICS Description: Petroleum Bulk Stations and Terminals

Plan Sequence Number: 1000013561

# **Section 2. Toxics: Worst Case**

No records found.

Plan Sequence Number: 1000013561

# **Section 3. Toxics: Alternative Release**

No records found.

## **Section 4. Flammables: Worst Case**

Flammable Worst ID: 1000008991

Model Used: EPA's RMP\*Comp(TM)

Endpoint used: 1 PSI

**Passive Mitigation Considered** 

Blast Walls:

Other Type: Common Impoundment

Facility Name: Winslow LPG Terminal Plan Sequence Number: 1000013561 EPA Facility Identifier: 1000 0021 0755

## Section 5. Flammables: Alternative Release

Flammable Alter ID: 1000008472

Model Used: EPA's RMP Guidance for Propane Storage Facilities

Reference Tables or Equations

**Passive Mitigation Considered** 

Dikes:

Fire Walls: Blast Walls: **Enclosures:** 

Other Type:

**Active Mitigation Considered** 

Sprinkler System: Deluge System: Water Curtain:

Excess Flow Valve: Yes

Remotely actuated valves, Emergency Shutdown System, Flammable Gas Detection, Firewater Water System, Smarthoses Other Type:

Common Impoundment

Plan Sequence Number: 1000013561

# **Section 6. Accident History**

No records found.

Plan Sequence Number: 1000013561

## Section 7. Program Level 3

## Description

No description available.

## Program Level 3 Prevention Program Chemicals

1000016645 Prevention Program Chemical ID: Chemical Name: Butane Flammable/Toxic: Flammable CAS Number: 106-97-8

Prevention Program Level 3 ID: 1000013880 NAICS Code: 42471

Prevention Program Chemical ID: 1000016644 Chemical Name: Propane Flammable/Toxic: Flammable CAS Number: 74-98-6

Prevention Program Level 3 ID: 1000013880 NAICS Code: 42471

## Safety Information

Safety Review Date (The date on which the safety information was last reviewed or revised):

24-Mar-2010

## Process Hazard Analysis (PHA)

PHA Completion Date (Date of last PHA or PHA update):

24-Mar-2010

## The Technique Used

What If:

Checklist: Yes

What If/Checklist:

HAZOP: Yes

Failure Mode and Effects Analysis:

Fault Tree Analysis: Other Technique Used:

PHA Change Completion Date (The expected or actual date of completion of all changes resulting from last PHA or PHA update):

## Major Hazards Identified

Toxic Release:

Fire: Yes Explosion: Yes Runaway Reaction:

Polymerization:

Overpressurization: Yes
Corrosion: Yes
Overfilling: Yes

Contamination:

Equipment Failure: Yes

Loss of Cooling, Heating, Electricity, Instrument Air:

Earthquake:

Floods (Flood Plain):

Tornado: Hurricanes:

Other Major Hazard Identified: Loss of system integrity

## **Process Controls in Use**

Vents: Yes
Relief Valves: Yes
Check Valves: Yes

Scrubbers: Flares:

Manual Shutoffs:YesAutomatic Shutoffs:YesInterlocks:YesAlarms and Procedures:Yes

Keyed Bypass:

Emergency Air Supply:

Emergency Power: Yes

Backup Pump:

Grounding Equipment: Yes

Inhibitor Addition: Rupture Disks:

Excess Flow Device: Yes

Quench System: Purge System:

None:

Other Process Control in Use:

## Mitigation Systems in Use

Sprinkler System:

Dikes: Fire Walls:

Blast Walls: Deluge System:

Water Curtain: Enclosure: Neutralization:

None:

Other Mitigation System in Use: Firewater system, ESD system

### Monitoring/Detection Systems in Use

Process Area Detectors:

Perimeter Monitors: Yes

Plan Sequence Number: 1000013561

None:

Other Monitoring/Detection System in Use:

## Changes Since Last PHA Update

Reduction in Chemical Inventory:

Increase in Chemical Inventory:

Change Process Parameters:

Installation of Process Controls:

Installation of Process Detection Systems: Installation of Perimeter Monitoring Systems:

Installation of Mitigation Systems:

None Recommended:

None:

Other Changes Since Last PHA or PHA Update:

## **Review of Operating Procedures**

Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures): 02-Jun-2010

Yes

## **Training**

Training Revision Date (The date of the most recent 02-Jun-2010 review or revision of training programs):

## The Type of Training Provided

Classroom: Yes
On the Job: Yes

Other Training:

## The Type of Competency Testing Used

Written Tests: Yes
Oral Tests: Yes
Demonstration: Yes
Observation: Yes

Other Type of Competency Testing Used:

### Maintenance

Maintenance Procedures Revision Date (The date of 02-Jun-2010 the most recent review or revision of maintenance procedures):

Equipment Inspection Date (The date of the most recent equipment inspection or test):

02-Jun-2010

Equipment Tested (Equipment most recently inspected or tested):

vessels, piping, relief valves, ESD system, meters, pumps, pump seals, truck loading dock equipment, railcar rack equipment and fire extinguishers

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## Management of Change

Change Management Date (The date of the most recent change that triggered management of change procedures):

Change Management Revision Date (The date of the most recent review or revision of management of change procedures):

## **Pre-Startup Review**

Pre-Startup Review Date (The date of the most recent pre-startup review):

02-Jun-2010

## **Compliance Audits**

Compliance Audit Date (The date of the most recent compliance audit):

Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit):

## Incident Investigation

Incident Investigation Date (The date of the most recent incident investigation (if any)):

Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation):

## **Employee Participation Plans**

Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans):

27-Apr-2010

#### Hot Work Permit Procedures

Hot Work permit Review Date (The date of the most 27-Apr-2010 recent review or revision of hot work permit procedures):

### Contractor Safety Procedures

Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures):

27-Apr-2010

Contractor Safety Performance Evaluation Date (The date of the most recent review or revision of contractor safety performance):

02-Jun-2010

## **Confidential Business Information**

Plan Sequence Number: 1000013561

CBI Claimed:

Plan Sequence Number: 1000013561

# **Section 8. Program Level 2**

Plan Sequence Number: 1000013561

## **Section 9. Emergency Response**

## Written Emergency Response (ER) Plan

Community Plan (Is facility included in written community emergency response plan?):

Yes

Facility Plan (Does facility have its own written emergency response plan?):

Yes

Response Actions (Does ER plan include specific actions to be taken in response to accidental releases of regulated substance(s)?):

Yes

Public Information (Does ER plan include procedures for informing the public and local agencies responding to accidental release?):

Yes

Healthcare (Does facility's ER plan include information on emergency health care?):

## **Emergency Response Review**

Review Date (Date of most recent review or update 02-Jun-2010 of facility's ER plan):

## **Emergency Response Training**

Training Date (Date of most recent review or update 02-Jun-2010 of facility's employees):

### **Local Agency**

Agency Name (Name of local agency with which the Winslow Fire Department facility ER plan or response activities are coordinated):

Agency Phone Number (Phone number of local agency with which the facility ER plan or response activities are coordinated):

(928) 289-2091

## Subject to

OSHA Regulations at 29 CFR 1910.38: Yes
OSHA Regulations at 29 CFR 1910.120: Yes

Clean Water Regulations at 40 CFR 112:

RCRA Regulations at CFR 264, 265, and 279.52:

OPA 90 Regulations at 40 CFR 112, 33 CFR 154,

49 CFR 194, or 30 CFR 254:

State EPCRA Rules or Laws:

Other (Specify):

## **Executive Summary**

Accidental release prevention and emergency response policies:

The Winslow Terminal has implemented all the elements of an EPA 40 CFR Part 68 Accidental Release Prevention Requirements, Program 3 Risk Management Plan (RMP) and all the elements of OSHA 29 CFR Part 1910.119 Process Safety Management (PSM) of Highly Hazardous Chemicals regulation. The Winslow Terminal complies with National Fire Protection Association NFPA-58 Liquefied Petroleum Gas Code requirements for LP-Gas Storage, and it is company policy to adhere to all applicable federal, state, and local laws. If an emergency were to occur, it is company policy to notify the Winslow, AZ Fire Department and request that they respond to the emergency.

The Stationary Source and Regulated substances:

The Winslow Terminal is a bulk liquefied petroleum gas terminal that receives butane and propane by rail car. Butane and propane is stored at the Winslow Terminal and distributed by customer truck transports.

General Accidental Release Prevention Program:

The Winslow Terminal has developed and implemented the all the elements of the EPA 40 CFR Part 68 Accidental Release Prevention Requirements, Program 3 Risk Management Plan (RMP) and all the elements of OSHA 29 CFR Part 1910.119 Process Safety Management (PSM) of Highly Hazardous Chemicals regulations. The Winslow Terminal adheres to the National Fire Protection Association NFPA-58 Liquefied Petroleum Gas Code requirements for LP-Gas Storage and all applicable federal, state, and local laws.

Process Safety Information (PSI): The Winslow Terminal has compiled written process safety information for all PSM covered processes. The process safety information includes the hazards of chemicals used or produced in the process, process technology information, and process equipment data. The process safety information is updated whenever process changes are made using management of changes and pre-startup safety reviews.

Accurate and complete process safety information enables the Winslow Terminal employees involved in operating and maintaining the terminal to identify and understand the hazards of the process. Process safety information is used to conduct process hazard analysis on the existing process or a proposed modification to a process.

Process Hazard Analysis (PHA): The Winslow Terminal is committed to performing a detailed hazard analysis of each covered process to identify, evaluate, and control hazards involved in the processes. Each process is systematically examined to identify potential hazards, controls in place to manage these hazards, and recommend additional controls, as appropriate.

The Winslow Terminal uses the hazard and operability (HAZOP) and check list PHA methodologies, which are conducted by a team of people who have operating and maintenance experience, engineering expertise and PHA facilitator training. The PHA team identifies and evaluates potential hazards of the process as well as accident prevention and mitigation measures, and makes suggestions for additional prevention and / or mitigation measures.

As a minimum the Winslow Terminal performs periodic PHA reviews or revalidations every 5 years as long as the process is operating.

PHA findings and recommendations and their resolution are documented. The Winslow Terminal has implemented a system to address and resolve all PHA findings and recommendations in a timely manner through a written schedule. All PHA findings and recommendation resolutions are communicated to all effected employees. All recommendations must be resolved and documented by management.

Operating Procedures (OP): The Winslow Terminal has developed and implemented written operating procedures that describe the tasks that terminal operators and transport drivers must perform, the safe process operating parameters that must be maintained, and safety precautions for operations and maintenance activities.

The Winslow Terminal written operating procedures address steps for each operating phase, including: (1) initial start-up, (2) normal

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operations, (3) temporary operations, (4) emergency shutdown, (5) emergency operations, (6) normal shutdown, and (7) start-up after turnaround.

The Winslow Terminal written operating procedures state the operating limits including the consequences of deviation and the steps required to correct or avoid the deviation.

The Winslow Terminal written operating procedures describe all the process safety systems and their functions.

The Winslow Terminal written operating procedures are reviewed and certified annually for current practices and accuracy.

Safe Work Practices and Procedures: The Winslow Terminal has developed and implemented safe work practices in accordance with the OSHA 29 CFR Part 1910 requirements that include methods for controlling plant entry, presence and exit of support personnel, and lockout/ tagout procedures to ensure isolation of energy sources for equipment undergoing maintenance, hot work procedures and permits for work with the potential for generating ignition sources in the presence of flammable or combustible material, and confined space entry permits and procedure to ensure that adequate precautions are in place before entry is allowed into a permit required confined space.

Training: The Winslow Terminal has developed and implemented formal operator and maintenance training programs. Initial training insures that new or reassigned personnel are trained in an overview of the process and operating procedures. Refresher training is performed at least every three (3) years to ensure that the operator understands and adheres to the current operating procedures of the process. Employees are tested to demonstrate their understanding of the training and competency.

Contractors: The Winslow Terminal has developed and implemented a program to ensure that contractors used to supplement its workforce to perform maintenance, renovation or specialty work on or near RMP / PSM covered processes are qualified to perform the work and are informed of the potential hazards. The Winslow Terminal personnel monitor the contractor activities throughout all maintenance, renovation or specialty work on or new RMP / PSM covered processes.

Pre-startup Safety Reviews (PSSR): The Winslow Terminal requires a pre-startup safety review (PSSR) to be performed and documented for any physical modification in the PSM covered processes. Additionally, any new units added at the Winslow Terminal which is considered PSM covered processes will also require a PSSR to be performed and documented.

Mechanical Integrity: The Winslow Terminal has developed and implemented procedures to maintain the on-going mechanical integrity of critical process equipment in accordance with National Fire Protection Association NFPA-58 Liquefied Petroleum Gas Code requirements for LP-Gas Storage and industry recognized and generally accepted good engineering practices.

Inspections and tests are documented and deficiencies outside of the acceptable limits are corrected before further use or in a safe and timely manner.

Hot Work Permits: The Winslow Terminal has developed and implemented a hot work permit system in accordance with the OSHA 29 CFR Part 1910 requirements for hot work operations conducted on or near a covered process.

Management of Change: The Winslow Terminal requires that a management of change (MOC) be performed for any modification to equipment, procedures, products and process parameters of a PSM covered process.

Incident Investigation: The Winslow Terminal requires that any incidents that resulted in the release of regulated substances, or a near miss, must be investigated as soon as possible, but no later than 48 hours following the incident. The Winslow Terminal has established a system to promptly address and resolve incident investigation findings and recommendations.

Compliance Audits: The Winslow Terminal conducts audits on a regular basis to ensure that the facility is in compliance with applicable all the elements of the EPA 40 CFR Part 68 Accidental Release Prevention Requirements, Program 3 Risk Management Plan (RMP), all the elements of OSHA 29 CFR Part 1910.119 Process Safety Management (PSM) of Highly Hazardous Chemicals regulation, and the requirements of the National Fire Protection Association NFPA-58 Liquefied Petroleum Gas Code requirements for LP-Gas Storage and all applicable codes and regulations.

Five-year Accident History:

No release of a regulated substance has occurred in the last 5 years.

Emergency Response Program Information: The Winslow Terminal Emergency Response Plan is site-specific. It includes required actions by plant employees as well as required notification and coordination with local responders and agencies. All employees are trained in the execution of the Emergency Response Plan and drills are conducted.

Emergency response program changes are administered through the MOC process.

Trade Secrets: There are no trade secrets applicable to the Winslow Terminal processes.

Planned Changes to Improve Safety: No outstanding changes to improve safety have been identified by the PHA team.